

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|---|---|-------------------------------|
| JOHN M. CONSTANTINI, | : | Civil Action No. 05-680 (GMS) |
| on his own behalf and as administrator of | : | |
| the estate of CHERYL A. CONSTANTINI, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| OPTIMUM CHOICE, INC., | : | |
| | : | |
| Defendant. | : | |

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*
OF KIMBERLY A. HENDRIX, ESQUIRE**

Pursuant to Local Rule 83.5 and the attached Certification, counsel respectfully moves the admission *pro hac vice* of Kimberly A. Hendrix, Esquire, of Stradley Ronon Stevens & Young, LLP, 2600 One Commerce Square, Philadelphia, PA 19103-7098, (215) 564-8000 (Phone), (215) 564-8120 (Fax), khendrix@stradley.com, to represent Optimum Choice, Inc. in this matter.

Respectfully submitted,

/S/ Maryanne T. Donaghy, Esq.

Maryanne T. Donaghy (#4213)
Stradley Ronon Stevens & Young, LLP
300 Delaware Ave., Suite 800
Wilmington, DE 19801
(302) 576-5850 (phone)

Dated: November 14, 2005

Attorney for Defendant,
Optimum Choice, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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| JOHN M. CONSTANTINI, | : | Civil Action No. 05-680 (GMS) |
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| the estate of CHERYL A. CONSTANTINI, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| OPTIMUM CHOICE, INC., | : | |
| | : | |
| Defendant. | : | |

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted and practicing in good standing as a member of the bars of the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Courts for the Eastern and Middle Districts of Pennsylvania, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the

annual fee of \$25.00 has been paid to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

Kimberly A. Hendrix

Kimberly A. Hendrix, Esquire
Stradley Ronon Stevens & Young, LLP
2600 One Commerce Square
Philadelphia, PA 19103-7098
(215) 564-8000 (Phone)
(215) 564-8120 (Fax)
khendrix@stradley.com

Date: November 8, 2005

Attorney for Defendant,
Optimum Choice, Inc.

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FOR THE DISTRICT OF DELAWARE**

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| JOHN M. CONSTANTINI, | : | Civil Action No. 05-680 (GMS) |
| on his own behalf and as administrator of | : | |
| the estate of CHERYL A. CONSTANTINI, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| OPTIMUM CHOICE, INC., | : | |
| | : | |
| Defendant. | : | |

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2005, I electronically filed the Motion and Order for Admission *Pro Hac Vice* of Kimberly A. Hendrix, Esquire, and attached Certification of Counsel, with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

John S. Spadaro (#3155)
1011 Centre Road, Suite 210
Wilmington, DE 19805
(302) 472-8100
Attorney for Plaintiff,
John M. Constantini, on his own behalf
and as Administrator of the Estate of Cheryl A. Constantini

/S/ Maryanne T. Donaghy
Maryanne T. Donaghy (#4213)
Stradley Ronon Stevens & Young, LLP
300 Delaware Ave., Suite 800
Wilmington, DE 19801
(302) 576-5850

Attorney for Defendant,
Optimum Choice, Inc.